

Columbia Ready Mix, Inc.

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JUN 23 2000
OFFICE OF AIR

File:
____ Ent/ compliance
____ TV Application
____ TV Activity
____ Other

June 5, 2000

United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA. 98101

Re: Request for Information Regarding Applicability for Columbia Ready-Mix, Inc. and Columbia Asphalt & Gravel, Inc. of Clean Air Act Rules, Pursuant to Section 114 of the Clear Air Act, EPA Docket No. CAA-10-2000-0104

Dear Ms Thompson

Per our telephone conversations today June 5th, 2000 please accept for your review and consideration this Letter as our formal response to EPA's letter dated April 13, 2000.

First and foremost, please accept my sincere apologies for the late hour response. I will attempt to respond to each of the letter's requests beginning with number 7.

7. Columbia Asphalt & Gravel, Inc. is a contracting firm; Columbia Ready-Mix, Inc is a manufacturing firm. Sharing common forces does occur occasionally, particularly with the transportation of mobile equipment, however the costing is accounted for and included as revenue for each respective Company at the time the sharing takes place, arms length. Operations Managers are not shared, security is site specific; however Columbia Asphalt & Gravel, Inc. may at times have mobile equipment located at one of Columbia Ready-Mix, Inc.'s facility.
8. Columbia Asphalt & Gravel, Inc. Corporate Executive Officers are as follows:
Lawrence D. Sali, President
Steven R. Sali, Vice-President
P. Leonard Sali, Secretary-Treasurer
Columbia Ready-Mix, Inc. Corporate Executive Officers are as follows:
P. Leonard Sali, President
Steven R. Sali, Vice-President
Lawrence D. Sali, Secretary-Treasurer
9. Current Ownership at this time is as follows:
Columbia Ready-Mix, Inc. - 25% each
Deborah K. Burksfield - day to day managerial responsibility -Financial Controller
P. Leonard Sali - day to day managerial responsibility - Operations Manager, Environmental Compliance, Capital & Operating Expenditures
Steven R. Sali - Corporate Officer
Lawrence D. Sali - Corporate Officer
Columbia Asphalt & Gravel, Inc.
Deborah K. Burksfield 3% - day to day managerial responsibility - Financial Controller
Lawrence D. Sali 23%- day to day managerial responsibility - Operations Manager, Capital & Operating Expenditures
P. Leonard Sali 23%- Corporate Officer
Steven R. Sali 23% - Corporate Officer
Maxine Sali 14%- Retired Owner
Philip J. Sali 14% - Retired Owner

10. The facilities, (and I must say I am a bit confused, in what sense the term "Facility" is being referred to, are you considering both companies as facilities, or are you considering the physical operations as facilities?) occasionally share transportation equipment, ie: tractor for moving trailers, but again both the costs and revenues are recorded at the time of sharing, arms length. There is no logical reason, I can think of for the companies to share pollution control equipment, as Columbia Asphalt & Gravel, Inc. does not manufacture materials, at any of the sites.
11. The Companies do not share feedstocks, intermediate products, byproducts or manufacturing equipment, Columbia Asphalt & Gravel, Inc. purchases materials, products, byproducts, and has on occasion rented manufacturing equipment from Columbia Ready-Mix, Inc. for projects which the property owner ie: WSDOT provided a pit. Again the cost and revenue is recorded at the time, arms length.
12. Not Applicable
13. There is not a dependency relationship between companies, both stand alone on their own merit, although they may have some common customers, the scope of service is totally non-related.
14. There is common employee health plans, retirement plans, insurance coverage, and administrative functions.
15. Columbia Asphalt & Gravel, Inc. does not have any rock crusher, or grinding mill. Columbia Ready-Mix, Inc. does have a rock crusher and grinding mill- the crusher is currently rated at approximately 200 tons per hour and is a portable plant.
16. I am unsure how to respond to this question, which facility are you referring to?
17. Columbia Asphalt & Gravel, Inc. is not a hot mix facility.
18. I am unsure how to respond to this question, which facility are you referring to?
19. Columbia Asphalt & Gravel, Inc. 1611, 1629; Columbia Ready-Mix, Inc. 2951,3273,5032
20. I do not have the expertise to provide you with this information at this time, but I am prepared to provide you with documentation of emissions for the Asphalt Plants and Crushing Plant as prepared by independent firms and others whom are.

If you have any questions please feel free to contact at your earliest convenience.

Respectfully,



Deborah K. Burksfield, Controller
Columbia Ready-Mix, Inc.